

**REMARKS**

Reconsideration of the present application is respectfully requested. Claims 12-20 have been withdrawn from consideration. Claims 21 and 22 are currently pending.

Claim 21 stands rejected under 35 U.S.C. 103(a) as being unpatentable over GB 2119711 ("the GB patent") in view of U.S. Patent No. 6,116,158 to DeMoore et al. ("DeMoore"). The Office Action asserts that the GB patent teaches a "method of operating a printing unit in an offset printing machine having a convertible fluid applying unit which serves as both a lacquer applying unit and a dampening (moistening) unit for selective applying lacquer or dampening liquid as claimed including particularly the processes of engaging an inking unit (ink rollers 8) with plate cylinder 6 when the fluid applying unit is used to apply dampening liquid using rollers 1 and 3-5 and of disengaging the inking unit 8 from the plate cylinder when the fluid applying unit is converted to apply lacquer using rollers 1, 3-5, 5' and 7."

The Office Action indicates that the fluid applying unit of the GB patent "uses a fountain roller 1 and a doctor blade 12 combination to control the amount of fluid being applied to the printing cylinder(s) rather than a doctor blade chamber device having a screen roller as recited." The Office Action asserts that DeMoore teaches "an inking or coating apparatus for use in a rotary offset printing machine the conventional use of a fluid applying device having a sealed doctor blade chamber device 70 with a screen roller 66 to apply fluid to the plate cylinder 32 by direct contact with the plate cylinder." The Office Action asserts that it would have been obvious to those having ordinary skill in the art to provide the fluid applying device in the GB patent with a doctor blade chamber device having a screen roller appropriately disposed as taught by DeMoore in order to enhance the fluid applying operation of the fluid applying device because the sealed doctor chamber device can prevent the fast drying coating material to dry prematurely and change viscosity.

Applicant respectfully submits that the GB patent in view of DeMoore fails to teach or suggest all of the features of independent claim 21. The GB patent discloses a system in which a plate cylinder 6 is supplied with ink through an inking device including ink transfer rollers 8, 9. In the system of the GB patent, a combined moistening and lacquering device comprises a box 2 having a moistening agent which could be lacquer or water. According to the

GB patent, a doctor 1 is used in contact with a wiper 12 and transfer rollers 3, 4, 5, and 7 in order to transfer the lacquer or the liquid to the plate cylinder 6 and/or the blanket cylinder 10.

Applicant respectfully submits that the wiper 12 is not a doctor blade as asserted in the Office Action. Moreover, the GB patent does not even provide an explicit explanation of the way the wiper 12 functions. However, from page 1, lines 104-105 of the GB patent it appears that the counter-rotating metering roller 13 could be used as an alternative to the wiper 12. Accordingly, it appears the wiper 12 is a "soft" wiper. The alternative embodiment of the GB patent in the form of the counter-rotating metering roller indicates that the contact could be conceived as "smooth" contact, which is contrary to the "sharp" contact which is obtained with a doctor blade. The term "doctor blade" is well recognized in the industry by those skilled in the art [See for example, the doctor blade described in the attached Tresu document]. As is well known, doctor blades are manufactured of hard materials such as carbon steel, stainless steel, etc. and are intended to make sharp contact with a roller during a doctoring operation. Applicant respectfully submits that the function provided by a doctor blade is not the same as that of the wiper 12 of the GB patent. For at least the foregoing reasons, Applicant respectfully submits that the GB patent fails to teach or suggest use of a doctor blade.

Although DeMoore teaches a doctor blade chamber device 70 and screen roller 66, Applicant respectfully submits that DeMoore fails to teach or suggest the feature of independent claim 21 of "providing a doctor blade chamber device and a screen roller which operates as both a lacquer applying unit and a dampening unit for alternately applying lacquer and alternately applying water." DeMoore describes a doctor blade chamber device 70 and screen roller 66 which is only used for contact with a plate cylinder 32 in order to effect an inking/coating operation. Applicant respectfully submits that DeMoore fails to teach or suggest that the doctor blade chamber device 70 and screen roller 66 could be used for interchanging between lacquer application and water application. In view of the foregoing, Applicant respectfully submits that it would not be obvious to one of ordinary skill in the art to combine the teachings of the GB patent and DeMoore to arrive at the invention of independent claim 21. Applicant respectfully submits that independent claim 21 distinguishes over the GB patent in view of DeMoore and requests that the 35 U.S.C. 103(a) rejection of independent claim 21 be withdrawn.

Claim 22 stands rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 4,722,273 to Jahn ("Jahn") in view of DeMoore. The Office Action asserts that Jahn teaches "the method of operating a printing unit in an offset printing machine including a cylinder 5 or 8, an inking unit 6, a lacquer applying unit 11 which applies lacquer and a dampening unit 7 which applies water." The Office Action further asserts that Jahn particularly teaches "the process of engaging the inking unit 6 with cylinder 5 when the dampening unit 7 is applying water to carry out offset printing and of disengaging the inking unit 6 from the plate cylinder 5 when the lacquer applying unit 11 is applying lacquer."

The Office Action indicates that "neither the lacquer applying unit 11 nor the dampening unit 7 of Jahn uses a doctor blade chamber device to control the amount of fluid being applied as recited." The Office Action asserts that DeMoore teaches "an inking or coating apparatus for use in a rotary offset printing machine the conventional use of a fluid applying device having a sealed doctor blade chamber device 70 with a screen roller 66 to apply fluid to the plate cylinder 32 by direct contact with the plate cylinder." The Office Action asserts that it would have been obvious to those having ordinary skill in the art to provide the fluid applying device in the GB patent with a doctor blade chamber device having a screen roller appropriately disposed as taught by DeMoore in order to enhance the fluid applying operation of the fluid applying device because the sealed doctor chamber device can prevent the fast drying coating material to dry prematurely and change viscosity. Applicant notes that the rejection of independent claim 21 cited a combination of Jahn and DeMoore, not the GB patent and DeMoore as cited in the motivation to combine in the Office Action.

Applicant respectfully submits that Jahn in view of DeMoore fails to teach or suggest all of the features of independent claim 22. Applicant respectfully submits that Jahn fails to teach or suggest at least the features of independent claim 22 of "providing a first doctor blade chamber device and a screen roller which operates as a lacquer applying unit for applying lacquer" and "providing a second doctor blade chamber device which operates as a dampening unit for applying water." Jahn describes a doctor blade 15 used in a washing device for washing a rubber blanket cylinder in a rotary offset printing machine. Jahn contains no teaching or suggestion of using a doctor blade chamber device which operates as a dampening unit. Applicant further submits that DeMoore also fails to teach or suggest such a feature. In view of

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the foregoing, Applicant respectfully submits that it would not be obvious to one of ordinary skill in the art to combine the teachings of the Jahn and DeMoore to arrive at the invention of independent claim 22. Applicant respectfully submits that independent claim 22 distinguishes over Jahn in view of DeMoore and requests that the 35 U.S.C. 103(a) rejection of independent claim 22 be withdrawn.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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